

In the matter of 1998 biennial Regulatory Review - Amendment to Part 97 of the  
Commission's Amateur Service Rules, FCC WT Docket 98-143

FCC Secretary Magalie Roman Salas  
Office of the Secretary,  
Federal Communications Commission  
1919 M Street N.W. Room 222  
Washington, D.C. 20554

Public Service is the basis on which the Amateur Service license has been authorized since its inception. This is the aspect on which the Commission is urged to focus, and which we here address, as follows:

(1) license privileges and classes, (2) testing requirements (code), (3) RACES Station licensing (4) Amateur operations.

Background and Basis

Since 1985 California has had an aggressive program utilizing Amateur licensees. That year the state legislature mandated a paid staff coordinator with directions to enhance and expand that public service function involving Amateur licensees. In April 1985 we began a series of educational bulletins statewide at a time when there were but three RACES units in the state. Today almost all of the 58 counties have an emergency communications unit based on the Amateur licensees; and our weekly EMCOMM Bulletins have world-wide distribution in addition to every state in the country.

In so far as we know, our program - the leader in the nation- is the only one with a paid staff position created by the state legislature to support the use of Amateur licensees in service to their communities.

In 1987 the American Radio Relay League requested that the statewide Bulletins be placed in the Amateur packet radio networks around the U.S. In time they became the standard in the US, replacing a defunct FEMA educational program. Today these Bulletins are *the* source of educational information for emergency communications units based on Amateur Radio. They are literally on hundreds of bulletin boards and Internet sites around the *world*.

Because we are involved daily with the quintessential public service - their use in and for local governments, we have a broader experience of Amateur licensee *activities* than most petitioners. Our program is the recognized model in the U. S., Canada, Australia, New Zealand, England and other countries worldwide. The weekly EMCOMM Bulletins are on the worldwide Web at [WWW.acs.oes.ca/](http://WWW.acs.oes.ca/). Our Manual, titled the "Establishing and Maintaining an Emergency Communications Unit for Government", is the only one of its kind in the country.

(2) testing requirements    (4) Amateur operations

In the 1990's very significant changes have occurred affecting the usefulness of Amateur radio licensees to government. Today we face information systems that did not exist in the past. As we look to the year 2000 we need Amateur licensees capable of providing a variety of services in communications, typically computer based.

Thus, the use of code has declined to where it is no longer viable for government.

a. California eliminated the use of CW some years ago. Although we have a large and extensive state communications center staffed for and with Amateur licensees, we had not used CW in this decade. We retained a CW net until 1995, but it served no essential purpose, just once-a-week training for 3-5 participants. No county governments participated for years.

No. of Copies rec'd 0 + 9  
List ABCDE

b. The US Coast Guard also eliminated the use of morse code several years ago, which is further evidence of its lack of applicability to today's communications needs.

Today, our informational systems are computer based and operate both by wire and wireless. If the Amateur of today is not familiar with computers he/she is of little use. A background in computer experience and knowledge is far and away more important than that of CW.

When I became licensed in 1941 Amateur radio was *the* means of alternative communication. Today, the computer provides that, hence thousands of those who would otherwise be FCC Amateur service licensees never apply because the service does not attract them. Until we recognize that factor the service will not grow significantly, nor do we get the new blood of technically oriented people to spark the new innovations so badly needed.

To make matters worse, to a large degree an 'old-boy network' exists in Amateur radio; one that grew up with "you must pass the code" concept. Like people everywhere "what's good enough for me is good enough for you" is the mindset of many of today's Amateurs. Without the ability to look to the future, or grasp the many changes occurring around them, they would keep practices long since useless. In government today we pass data digitally, not by CW or voice radio. In fact, there are government agencies who seek to do away with radio entirely.

One of my constant battles is to keep some radio capability functioning in government. There is a new breed of administrators who focus on the bottom dollar, not redundancy. Often they have no experience in communications failures, and their digital computer networks have not failed. They see no need for radio. So, they no longer fund or support radio programs. The Federal Highway Authority (FHWA) is one instance of an agency that no longer supports High Frequency radio. It's a very real every-day battle. Our fiscal year has just begun and yesterday I was informed that there are no funds for communications equipment as it all went for computers and computer systems.

**So, I urge the reduction of code requirement to 5 wpm at the General licensee level as it is not an essential skill qualifier in today's world.** When it is possible to do so under international radio regulations, I further urge the Commission to drop the CW requirement entirely. It is not relevant to the year 2001 and subsequent real-world needs in communications.

#### (1) license privileges and classes

The proposed classes (no-code Tech, General, Advance, Extra) are appropriate. There is a shortage of people above the Tech license interested in Emergency Communications. It has been the Tech licensee's that have made our programs possible. Without them the programs would flounder. There are exceptions, but in general it is the technician licensees we rely on today. Due to the shortage to those qualified to operate HF we have to put a higher qualified licensee with them just to staff HF circuits.

I urge the Commission to adopt a requirement of computer ability, at least at the General level. Knowledge of technical digital information is not important. There may be those who will assert that tests should include questions on Amtor, Pactor, Clover or such. The problem there, however, is that such modes are already out-of-date. To lock the testing into them is already a decade behind the time. *What we need is young minds open to new possibilities, not old minds locked in decades old mindsets.* There are enough computer 'specialists' around that it's easy to find them and they don't need to be Amateur licensees to fix technical problems. In fact, it is their interest in the technical aspects of computers that draws them away from Amateur radio.

I recommend that the licensee demonstrate the ability to use a computer; that is, demonstrate operating ability in a word processing program, in a text-editor, how to use eMail and how to use a communications program. These are skills that need demonstrating in person, in lieu of the code test. It will be difficult to have multiple choice or yes/no questions to uncover these skills. Have the applicant demonstrate ability on his/her computer or one by owned by the examiner. It's not too difficult to set such standards as it is required of countless job applicants these days. An alternative is some form of certification by a computer user group as to demonstrated skills.

### (3) RACES Station licensing

**I urge that the provision for RACES station licenses be dropped.** Few exist. Those that do should not be renewed. With today's easy availability of callsigns, the process of calls for government EOC's is simple. Here we formed a club to support the state activities and got licenses for each of the state's regional EOC's. It's not quite the same, but it works.

The disadvantage of the RACES station license is a provision in the current regulations that has been misapplied. (see....) This provision should be dropped. Specifically, that section states that a RACES Station (defined in ....) cannot talk to another RACES station. Legally that means two RACES Station LICENSEES. However it has been interpreted to mean that any Amateur licensee operating in the RACES (mode or activity) cannot talk to any Amateur licensee operating in a non-RACES activity. For instance, during the 1970's a FEMA employee criticized one of our California Amateurs for allowing a Amateur operating in a RACES activity to call and talk to an amateur for a club (non RACES) who had a telephone capable of solving a need. The FEMA person did not understand that it applied ONLY to a RACES station licensee.

Cary Mangum, Advanced Class Licensee W6WWW  
State RACES Officer, California  
State ACS Officer, California  
Emergency Coordinator, Telecommunications

